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November 13, 2023

The Honorable Judge Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York, 11201

Re: Kayumova et al. v. City of New York et al
Civil Action No: 1:22-cv-05453-KAM-VMS

Dear Judge Scanlon:

Please be advised that we represent the Plaintiffs, along with co-counsel Bruce Gitlin. We submit this letter as a joint status letter with defendants, pursuant to Your Honor's scheduling order. As indicated in our letter from September 20, 2023, on July 7, 2023 we filed a motion to amend to include two additional Plaintiffs in the case. This letter is being submitted, as a joint request from all parties, to respectfully request an extension of all discovery deadlines until the motion has been decided by this Court and then respectfully request that a new discovery order be created. The reason for this requested extension is that the parties cannot formulate or respond to discovery requests without knowing who all of the Plaintiffs are/will be in this case, and will likely need additional time to formulate and respond to said requests to include the proper Plaintiffs if this Court grants the aforementioned motion.

Additionally the Plaintiffs have submitted a settlement demand to Defendants in an effort to begin the process of seeking to settle this matter.

The parties thank Your Honor in advance for your consideration in this matter.

Respectfully submitted,

/s Clara R. Smit

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